

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

|  |                  |   |
|--|------------------|---|
| <b>IN RE:</b><br><b>ANTONIO ERNESTO AGUIRRE</b><br><br><i>Debtor's</i> | §<br>§<br>§<br>§ | <b>Chapter 13</b><br><b>Case No. 20-31192 - hcm</b> |
|--|------------------|---|

**TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

To the Honorable H. Christopher Mott, United States Bankruptcy Judge:

STUART C. COX, Standing Chapter 13 Trustee ("Trustee"), objects to Confirmation of the current Chapter 13 Plan filed by Debtor and as grounds would show the Court:

Trustee objects to confirmation of Debtor's Chapter 13 Plan insofar as Debtor's plan will not close or complete on the designated month and year. Trustee requests that said plan be amended to cure the plan term issue such that the plan completes and closes timely.

**Relief Sought**

Trustee prays for an Order Denying Confirmation of the proposed Chapter 13 Plan without prejudice to amend within fourteen (14) days of hearing, or in the alternative, that the instant case be dismissed, and that the Court grant the Chapter 13 Trustee such other, additional and further relief to which he may be justly entitled.

Respectfully submitted,

/s/Stuart C. Cox

Stuart C. Cox

Standing Chapter 13 Trustee

SBN: 00794992

/s/Lucille Zavala

Lucille Zavala

Senior Staff Attorney for Stuart C. Cox

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**CERTIFICATE OF SERVICE**

This certifies that a copy of this document was served upon the parties listed below by United States Mail, first class, postage prepaid on December 28, 2020.

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/s/Stuart C. Cox  
Stuart C. Cox  
/s/Lucille Zavala  
Lucille Zavala